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Counsel for Calpine Corporation, et al.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E Corporation, Pacific Gas & Electric Company,

Debtors.

Chapter 11

Case No. 19-30088 (DM)

(Lead Case)
(Jointly Administered)

**NOTICE OF MOTION FOR ORDER
AUTHORIZING WITHDRAWAL OF
COUNSEL**

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

1 PLEASE TAKE NOTICE that Calpine Corporation, on behalf of itself and its subsidiaries,
2 including without limitation, Russell City Energy Company, LLC, Los Esteros Critical Energy Facility,
3 LLC, Geysers Power Company, LLC, Gilroy Energy Center, LLC, Creed Energy Center, LLC, and Goose
4 Haven Energy Center, LLC (collectively, “Calpine”), hereby moves this Court for an Order Authorizing
5 Withdrawal of Counsel in the above-captioned chapter 11 cases. This motion (the “Motion”) is pursuant
6 to the applicable Rules of Procedure and is based upon this notice, the Motion, the Declaration of
7 Ameneh M. Bordi, and the pleadings and documents filed in this case.

8 PLEASE TAKE FURTHER NOTICE that, in accordance with Bankruptcy Local Rule
9 9014-1(3)(A), any objection to the requested relief, or a request for hearing on the matter, must be filed
10 with the Clerk of Court and served upon the initiating party within 21 days of mailing the notice;

11 Any objection or request for a hearing must be accompanied by any declarations or memoranda of
12 law any requesting party wishes to present in support of its position;

13 If there is no timely objection to the requested relief or a request for hearing, the Court may enter
14 an order granting the relief by default; and

15 In the event of a timely objection or request for hearing, the initiating party will give at least seven
16 days written notice of the hearing to the objecting or requesting party and to any trustee or committee
17 appointed in the case.

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1 DATED: January 28, 2021

KIRKLAND & ELLIS LLP

3 By: /s/ Michael P. Esser

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